

FINAL
FINDING OF SUITABILITY TO TRANSFER (FOST)
FORMER MARCH AIR FORCE BASE, CALIFORNIA
PARCEL I-3
APRIL 2006



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1. PURPOSE

1.1 The purpose of this Finding of Suitability to Transfer (FOST) is to document environmentally related findings and the suitability to transfer the real property and any improvements (the "Property") on Parcel I-3 at the former March Air Force Base (AFB), California, to the March Joint Powers Authority (hereinafter "Transferee"). The description of the Property for which this FOST supports is provided in Section 2 below. The described Property will be transferred by deed and its anticipated use is for community parks and recreational purposes.

1.2 This FOST is a result of a thorough analysis of information contained in the following documents:

- (1) Final Environmental Impact Statement (FEIS) for the Disposal and Reuse of March AFB, dated February 1996;
- (2) Basewide Environmental Baseline Survey (EBS), dated November 1994;
- (3) EBS Category Update, dated February 1999;
- (4) Draft Final Remedial Investigation/Feasibility Study (RI/FS) Operable Unit (OU) 2, dated July 1997;
- (5) Final OU 2, Air Force Real Property Agency (AFRPA), Record of Decision (ROD), dated April 2004;
- (6) Visual Site Inspections (VSIs), dated January 27, 2005, April 19, 2005 and March 7, 2006;
- (7) Supplemental EBS (SEBS) for Parcel I-3, dated March 15, 2006.

2. PROPERTY DESCRIPTION

The Property being addressed by this FOST is shown on the map included at Attachment 1a and is comprised of approximately 100 acres. The Property includes an open field and one structure associated with the water pump station operated by the Western Municipal Water District. Table 2.0 identifies this facility and associated details.

**Table 2.0
Property Inventory Description**

Facility Number	Former Air Force Use	Square Footage (approximately)
3411	Water Pump Station, constructed in 1953	1,075

3. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts of this Property transfer proposal have been adequately analyzed and disclosed in compliance with the NEPA. These impacts are analyzed in the FEIS, as appropriate. The major environmental impacts identified are insignificant.

4. ENVIRONMENTAL CONDITION OF THE PROPERTY

Based on a review of the VSIs and the supporting SEBS documentation, the overall Property is considered Department of Defense (DoD) Environmental Condition Category (ECC) 4. Category 4 is defined as “areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.” The condition of the Property has changed from the condition identified in both the original Basewide EBS and the 1999 EBS Category Update.

The Basewide EBS originally classified the Property as DoD ECC Category 7, areas that were not evaluated or require evaluation; and Category 1, areas where no release or disposal of hazardous substances or petroleum products has occurred. According to the Final Operable Unit (OU) 2 ROD, contaminants were found in samples of soil and water collected during the OU 2 Remedial Investigation. The 1999 *EBS Category Update* classified the Property as DoD ECC 4 as a result of the interim removal action conducted in 1996 at Site 6 (Landfill 4, LF006) and construction of two engineered waste cells. The cells were sealed with an impermeable cover. No Further Action status for Site 6 has been approved by the EPA (Environmental Protection Agency) and California Regional Water Quality Control Board (CRWQCB), as documented in the Final OU 2 ROD, April 2004. The ECC of Site 6 remains Category 4. Parcel Property outside of Site 6 remains ECC 1. Land use restrictions will be required to ensure that future use does not degrade the landfill cap integrity.

For reference, DoD property categories are defined as follows:

Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).

Category 2: Areas where only release or disposal of petroleum products has occurred.

Category 3: Areas where release, disposal, and/or migration of hazardous substances have occurred but at concentrations that do not require a removal or remedial response.

Category 4: Areas where release, disposal, and or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.

Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred and removal or remedial actions are underway, but all required actions have not yet been implemented.

Category 6: Areas where release, disposal, and/or migration of hazardous substances have occurred, but required actions have not yet been implemented.

Category 7: Areas that are not evaluated or require additional evaluation.

5. DEED RESTRICTIONS AND NOTIFICATIONS

The environmental documents listed in Section 1.2 were evaluated to identify environmental factors that may warrant constraints on certain activities in order to substantially minimize or eliminate any threat to human health or the environment. Such constraints typically are embodied as permanent restrictions in the deed or as specific notifications to the Transferee. The factors that require either deed restrictions or specific notifications are identified in Attachment 2 and are discussed below. Please reference the EBS, SEBS, and applicable VSIs for more detailed information on each resource category.

The Air Force has determined the remaining factors listed in Attachment 2 do not pose an unacceptable threat to human health or the environment, consistent with governing regulatory processes, therefore, do not require deed restrictions or notifications to the Transferee and are not discussed below.

5.1 Hazardous Substances Notification

Consistent with the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) § 120(h)(3), which requires that whenever federal property on which hazardous substances were stored for one (1) year or more, released or disposed of, is conveyed, each deed entered into for the conveyance of such property will include a notice of the type and quantity of such hazardous substances and of the time at which such storage, release or disposal took place. This notice requirement was codified at 40 Code of Federal Regulations (CFR), Part 373, which provides that the notice requirement applies only when hazardous substances are or have been stored in quantities greater than or equal to (1) 1,000 kilograms or the hazardous substance's CERCLA reportable quantity found in 40 CFR Part 302.4, whichever is greater (40 CFR Part 373.2(b)); or (2) 1 kilogram if the substance is an acutely hazardous substance found in 40 CFR Part 261.30 (40 CFR Part 373.2 (b)). Additionally, this regulation also provides that the notice required for the known release of hazardous substances applies only when the hazardous substances are or have been released in quantities greater than or equal to the substance's CERCLA reportable quantity.

A list of hazardous substances known to be stored for a period of one (1) year or more on the Property at quantities requiring notification, or disposed of on the Property, is provided in Attachment 3, Notice of Hazardous Substances Stored/Disposed. The Property contains some level of contamination by hazardous substances. This is addressed in Section 5.2 of the FOST. Since a release occurred, consistent with CERCLA requirements for notification of hazardous substance releases, a Notice of Hazardous Substance Release, including a description of response action taken, to the

extent such information is available, is provided in Attachment 4. Additionally, a hazardous substance notice will be given in the deed of the type and quantity of hazardous substances and the time at which storage for one (1) year or more, release, or disposal took place.

5.2 Environmental Restoration Program: Installation Restoration Program (IRP) sites and Areas of Concern (AOC).

5.2.1 IRP Sites and AOCs. There is one IRP site, Site 6 (IRP LF006, Landfill 4), located within the boundaries of the Property where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment in accordance with CERCLA § 120 (h)(3) have been taken for the Property. The determination that all remedial action necessary to protect human health and the environment is supported by the Final OU 2 ROD dated April 2004. Attachment 1b shows the location of Site 6 and other features associated with the Site.

The Final OU 2 ROD selected the Institutional Control (IC) remedy for Site 6. Waste from old landfills is consolidated in engineered waste cells in accordance with the final *Closure/Post Closure Maintenance Plan, Site 6, OU 2, Cell B Expansion, March Air Force Base*, September 1995. The IC remedy for Site 6 includes land use restrictions that will be incorporated in the deed as grantee covenants, and in a state land use covenant (SLUC). In the SLUC, the restrictions will be expressed in a different format, but they will be consistent with the grantee covenants in the deed. The SLUC will be signed and recorded immediately prior to deed transfer. The selected remedy is consistent with the current and anticipated future land use for the parcel surrounding Site 6 as recreational use.

Groundwater is sampled on a semiannual basis in accordance with the Basewide Groundwater Monitoring program, as required to meet post-closure compliance with Code of Federal Regulations (CFR), Title 40, Part 258 (40 CFR 250) and the California Code of Regulations (CCR) Title 27, Subchapter 3, Article 1. The results of the November 30, 2005 sampling event indicated non-detect for volatile organic compounds in all of the four downgradient monitoring wells except for 6M6MW6, which reported an estimated concentration of 0.41 micrograms per liter (µg/L) for tetrachloroethene (PCE), and a concentration of 20µg/L for trichloroethene. However, historical analytical results from 6M6MW6 have not shown the presence of these contaminants of concern and will be verified in future sampling events. The potential for future use of groundwater as a potable source is extremely unlikely (see Institutional Controls below).

5.2.2 IRP Institutional Controls: The following institutional controls will be established for the Property in order for the Air Force to comply with its obligation under CERCLA and the Final OU 2 ROD.

Covenants will be included in the deed to ensure that any response or corrective actions that are the responsibility of the Air Force for hazardous substances released or disposed of on the Property prior to the date of the deed which are found to be necessary after the date of delivery of the deed will be conducted by the United States Air Force. The above response assurance by the Air Force does not mean the Air Force will perform or fund any remediation to accommodate a change in land use desired by the Transferee that is inconsistent with any use restriction or covenants contained in the deed or other related Property transaction documents.

In addition to the Covenant to ensure that any response or corrective actions that are the responsibility of the Air Force for hazardous substances released or disposed of on the Property prior to the date of the deed, which are found to be necessary after the date of delivery of the deed, will be conducted by the United States, covenants will be included in the deed to ensure that environmental investigations and remedial activities will not be disrupted at any time. The deed will reserve a non-exclusive easement to allow continued access for the Air Force (or its designated contactor) and regulatory agencies to monitor the effectiveness of cleanup actions, perform CERCLA five-year reviews, and/or take additional remedial or removal actions as necessary.

With respect to Site 6, Landfill 4, the following restrictive covenants will be included in the deed and a SLUC, to be recorded in the land records of the County of Riverside prior to recording of the deed.

- Grantee covenants and agrees that it will not use Site 6 for residential purposes, hospitals for human care, public or private schools for persons under 18 years of age, or day care centers for children.
- Grantee covenants and agrees that it will not conduct or allow others to conduct any construction, excavation, drilling, grading, removal, trenching, filling earth movement, mining, and planting that would disturb the soil or the landfill cover, including the vegetative cap, or the injection or release of water or other fluids except for the purpose of monitoring groundwater or landfill gas.
- Grantee covenants and agrees that it will not extract groundwater from the Property for any purpose other than monitoring.
- Grantee covenants and agrees that it will not conduct or allow others to conduct activities that would cause disturbance or removal of fencing or signs intended to exclude the public from the landfill.
- Grantee covenants and agrees that it will not conduct or allow others to conduct activities that would cause the surface application of water (e.g. irrigation) to the extent that the integrity of the landfill is impacted and injection of water or other fluids that might affect groundwater flow direction.
- Grantee covenants and agrees that it will not conduct or allow others to conduct activities that would cause disturbance of any landfill equipment or systems, including the leachate collection system, the groundwater monitoring systems, and

settlement monuments; or that could affect the drainage, sub-drainage, or erosion controls for the landfill cover.

- Grantee covenants and agrees that it will not conduct or allow others to conduct activities that limit the Air Force, environmental regulators, or representatives of these agencies access to any landfill equipment and systems, including the leachate collection system, the groundwater monitoring systems, settlement monuments, or the drainage, sub-drainage, or erosion controls for the landfill cover.

5.3 Petroleum Products and Derivates

A petroleum contaminated site is present on the Property. All remedial actions to protect human health and the environment have been completed as discussed in Section 5.2. Covenants will be included in the deed to ensure that environmental investigation and remedial activities will not be disrupted at any time as described in Section 5.2.

5.4 Oil/Water Separators (OWSs).

There are no known OWS on this Property.

5.5 Unexploded Ordnance.

There were no known unexploded ordnance (UXO), discarded military munitions (DDM), waste military munitions (WMM), explosive soils, explosive debris, and/or munitions constituents (MC) on the Property. The deed, through the CERCLA covenant, will ensure that any response or corrective actions that are the responsibility of the Air Force for military munitions substances release or disposed of on the Property prior to the date of the deed which are found to be necessary after the date of delivery of the deed will be conducted by the United States. The deed will also ensure access to allow any response or corrective action found to be necessary on adjoining property.

5.6 Radioactive & Mixed Wastes.

There were no known radioactive or mixed waste sites on this Property.

5.7 Underground and Aboveground Storage Tanks (USTs and ASTs)

One UST and one AST were located on the Property. The UST identified at Facility 3411 was removed in 1991 and received closure from the County of Riverside Department of Environmental Health in October 1994. The AST tank is currently being used by the Western Municipal Water District. The AST identified at Facility 3411 is a 500-gallon diesel tank constructed of steel. There is no evidence of release to the environment from the remaining AST. Table 5.7 provides additional detail on the UST and AST. The Transferee will be responsible for complying with all applicable Federal, State, and local laws relating to the use of the AST. Approval of this FOST constitutes the AFRPA Director's approval for transfer of the AST. The Transferee will also assume

all liability for any leaks associated with the AST after the date of transfer as a condition of receiving the tank in lieu of its removal.

Table 5.7
Underground and Aboveground Storage Tanks

Tank Number/ Contents	Tank Capacity (gallons)	Location	Site, Releases, and/or Spill Number	Tank Status	Tank Closure Date
UST-3411/ Diesel or Gasoline	Unknown	Facility 3411	N/A	Removed 1991	1994
AST-3411/ Diesel	500	Facility 3411	N/A	Active	AST is still in use

5.8 Asbestos-Containing Material (ACM)

The Property as described in Section 2.0 contains ACM. The deed will contain the following notifications.

5.8.1 ACM in Structures and Buildings: A comprehensive survey of the condition of the ACM in March AFB facilities was conducted in June 1998. ACM was detected in Facility 3411. At the time of the survey the ACM was in good condition and not damaged or deteriorated to the extent that it would create a potential source of airborne ACM. Based on the January 27, 2005, April 19, 2005 and March 7, 2006 VSIs (SEBS Attachment 3) and a review of the EBS and EBS Category Update, the ACM located in the structures on the Property is still in good condition and not damaged or deteriorated to the extent that it would create a potential source of airborne fibers.

5.8.2 ACM in Utility Pipelines: No CERCLA remedial action for ACM in below ground utility pipelines is required. ACM, such as transite pipes or pipes wrapped with asbestos insulation, may be found in (or on) utility pipelines located on the Property. ACM associated with utility pipelines below ground does not pose a threat to human health or the environment as long as it is not disturbed, or if it is disturbed, proper care is taken to manage and dispose of it. Utility pipelines below the ground have not been inspected. The Transferee and subsequent Transferees will be given notice of the possibility of ACM in utility pipelines through a notice in the deed. The deed will provide notice to the Property recipients that the Air Force will not be responsible for the ACM in utility pipelines.

5.8.3 ACM in Demolition Debris: ACM, which was commonly used in building materials, may be located at building demolition locations. Based upon an inspection of the Property and a review of the EBS reports, no such locations where ACM from building demolition remains in the soil or in buried demolition debris are

specifically known on the Property associated with this FOST. No CERCLA remedial action is required at this time. However, it is possible that there are undiscovered locations where demolition debris may be found by the Transferee or subsequent Transferees during ground disturbance activities. The Property recipient and subsequent Transferees will be cautioned by notice in the deed to exercise care during ground disturbing activities. The Property recipient or subsequent Transferees will be required to notify the Air Force promptly of any demolition debris containing friable asbestos and believed to be associated with Air Force activities. The Property recipient or subsequent Transferees will be required to allow the Air Force a reasonable opportunity to investigate and, if a CERCLA remedial action is necessary, to accomplish it. The deed will reserve a non-exclusive easement to allow access for the Air Force (or its designated contractor) to evaluate any ACM discoveries and take remedial or removal actions as may be found necessary.

5.8.4 General: The deed will contain a provision stating that the Property recipient and subsequent Transferees, in their use and occupancy of the Property, will be responsible for complying with all applicable Federal, state, and local laws relating to asbestos. The deed will also state that the Air Force will be responsible for conducting any CERCLA remedial action found to be necessary for hazardous substances released or disposed of on the Property prior to the date of the deed, so long as the Property recipient is not a potentially responsible party under CERCLA for the release or disposal. The above response assurance by the Air Force does not mean the Air Force will perform or fund any remediation to accommodate a change in land use desired by the Property recipient that is inconsistent with use restrictions or covenants contained in the deed or other related Property transaction documents.

5.9 Drinking Water Quality.

The potable water system on the former March AFB has been transferred to Western Municipal Water District (WMWD). Facilities located on the Property are connected to this potable water system.

5.10 Indoor Air Quality (Radon).

The Air Force has not tested for radon gas in facilities on the Property (not previously residential use and no residential use planned).

5.11 Lead-Based Paint (LBP)-Facilities other than Target Housing & Residential Property

LBP and/or LBP hazards might be present in 3411 since it was built prior to 1978. The Transferee will be notified through the supporting EBS document and SEBS of the possible presence of LBP and/or LBP hazards in this facility. Notice was provided to the Transferee in the contract for sale that the Transferee would be responsible for managing all LBP and potential LBP in compliance with all applicable laws and regulation. No target housing or residential property is located on the Property.

5.12 Residuals of Lead-Based Paint and Lead-Based Material and Debris (collectively, "LBP")

Lead-based paint (LBP) was commonly used prior to 1978 and; therefore, LBP may be on the Property. Furthermore, LBP may have come to be in the soils as a result of deterioration, maintenance activities, and demolition. Based upon evaluation of available records, the Air Force has concluded that remedial action under CERCLA is not necessary.

Therefore, the deed shall include a notice to the Transferee and subsequent Transferees, notifying them that LBP may be on the Property and advising them that caution should be exercised during any use of the Property that may result in exposure to LBP. By a grantee covenant in the deed, the Transferee and its successors will acknowledge and accept responsibility for managing LBP, including LBP in soils, in accordance with all applicable laws and regulations and for promptly notifying the Air Force of any discovery of LBP in soils that appears to be the result of Air Force activities and is at concentrations requiring remediation. The Transferee and subsequent Transferees will be required to provide the Air Force an opportunity to investigate such discoveries, and, if a CERCLA remedial action is necessary, to accomplish it. The deed will reserve a non-exclusive easement to Air Force to enable it to investigate any such discoveries and take any remedial action found to be necessary.

5.13 Polychlorinated Biphenyls (PCBs).

All regulated PCB transformers were removed from March AFB by February 1994.

5.14 Air Conformity/Air Permit/Outdoor Air Quality.

No air emission sources are present on the Property.

5.15 Energy (Utility Infrastructure/Lines).

Gas and electric utilities service are located on the Property. Utility systems are not included in this FOST.

5.16 Floodplains.

The Property is outside of the 100-year floodplains.

5.17 Historic Property (Archeological/Native American, Paleontological)

No historic buildings or archeological/Native American sites are known to be located on or have been recorded on the Property.

5.18 Sanitary Sewer Systems (Wastewater).

No facility located on the Property is connected to the sanitary sewer system.

5.19 Sensitive Habitat.

Certain areas of the Property are classified as sensitive habitats as identified in Attachment 9. The deed will reference the existence of these sensitive habitats requiring protection and will contain a grantee covenant giving assurances that no actions will be taken that would adversely affect those sensitive habitats without appropriate regulatory agency approval.

5.20 Septic Tanks (Wastewater).

No septic tanks are located on the Property.

5.21 Solid Waste.

Solid wastes, to include municipal solid waste, are transported and disposed offsite at a permitted disposal facility. The Transferee will be responsible for securing all future disposal services and complying with all applicable federal, state, and local laws relating to solid waste disposal.

5.22 Threatened and Endangered Species.

No federal or state listed threatened, endangered or candidate species have been observed within the Property boundaries; however, there are potential sensitive habitats within the Property boundaries that may support these species.

5.23 Wetlands.

Certain areas of the Property are classified as designated wetlands. The deed will reference the existence of these wetlands and their regulatory control, and will contain restrictive provisions assuring that no actions can be taken that would adversely affect those wetlands. Any Property development affecting wetlands will be subject to Section 404 of the Clean Water Act [and any applicable State provisions]. Attachment 9 shows the locations of the wetlands located within the boundaries of the Property to be transferred.

6. REGULATOR COORDINATION

The California Department of Toxic Substances Control (DTSC) and the United States EPA were notified on March 16, 2005, of the initiation of the FOST, supporting EBS, and SEBS documentation, and were invited to participate in preparing the working draft documents consistent with the provisions of AFRPA's Procedures for Processing

Findings of Suitability to Lease/Transfer (FOST/FOSL and Supporting Environmental documents. issued jointly by Alan K. Olsen, AFBCA, Thomas W.L. McCall Jr., DAS/ESOH, and Timothy Fields Jr., DAA/OSWER in a memo dated June 8, 1995. Consolidated draft documents were provided on May 16, 2005, for their review and comment.

After reviewing and discussing regulatory comments (Attachment 5) with the applicable regulatory agency, certain lead-based paint comments were not incorporated or addressed as requested by the regulatory agencies. The Air Force's responses to these unresolved comments are provided in Attachment 6 (DTSC FOST Specific Comment #9 dated June 20, 2005). A draft final FOST and supporting SEBS documentation were provided for final coordination on March 17, 2006, and the regulators concurred that their comments were adequately addressed with the exception of the comments on lead-based paint (See FOST concurrence related correspondence at Attachment 7).

7. PUBLIC NOTICE

Public notice, as required by the FOST process, was provided on May 17, 2005 (a copy of notice is included in Attachment 8).

8. FINDING OF SUITABILITY TO TRANSFER

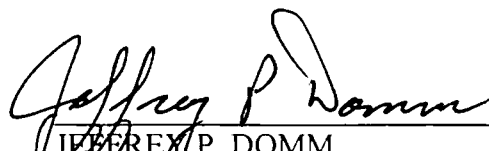
The deed proposal has been adequately assessed and evaluated for: (a) the presence of hazardous substances and contamination on the Property (b) environmental impacts anticipated from the intended use for the Property. (c) adequacy of use restrictions and notifications to ensure that the intended use is consistent with protection of human health and the environment, and (d) adequate notice of disclosures, including those required by CERCLA 120(h). The anticipated future use of this Property does not present a current or future risk to human health or the environment subject to inclusion and compliance with the appropriate restrictions on use and disclosures as addressed above. The following covenant CERCLA language will be included in the deed:

- CERCLA 120(h)(3)(A)(ii)(I) warranting that all remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances remaining on the Property have been taken before the date of transfer.
- CERCLA 120(h)(3)(A)(ii)(II) warranting that any remedial action under CERCLA found to be necessary after the date of transfer with respect to such hazardous substances remaining on the Property shall be conducted by the United States.
- CERCLA 120(h)(3)(A)(iii) granting the United States access to the Property in any case in which remedial action or corrective action is found to be necessary after the date of transfer.

The Conditions of CERCLA Section 120(h) have been satisfied. Therefore, the Property is suitable for transfer.

26 April 2006

Date


JEFFREY P. DOMM
Deputy Director
Air Force Real Property Agency

Attachments:

1. Property Map
2. Environmental Factors Table
3. Notice of Hazardous Substance Stored/Disposed
4. Notice of Hazardous Substance Released
5. Regulator Comments
6. Air Force Response to Regulator Comments
7. FOST Concurrence Related Correspondence
8. Related Notices and Correspondence
9. Sensitive Habitat and Wetlands Map

Parcel I-3 Property Map, Former March AFB, California

LEGEND

Structures/ Roads

Parcel I-3

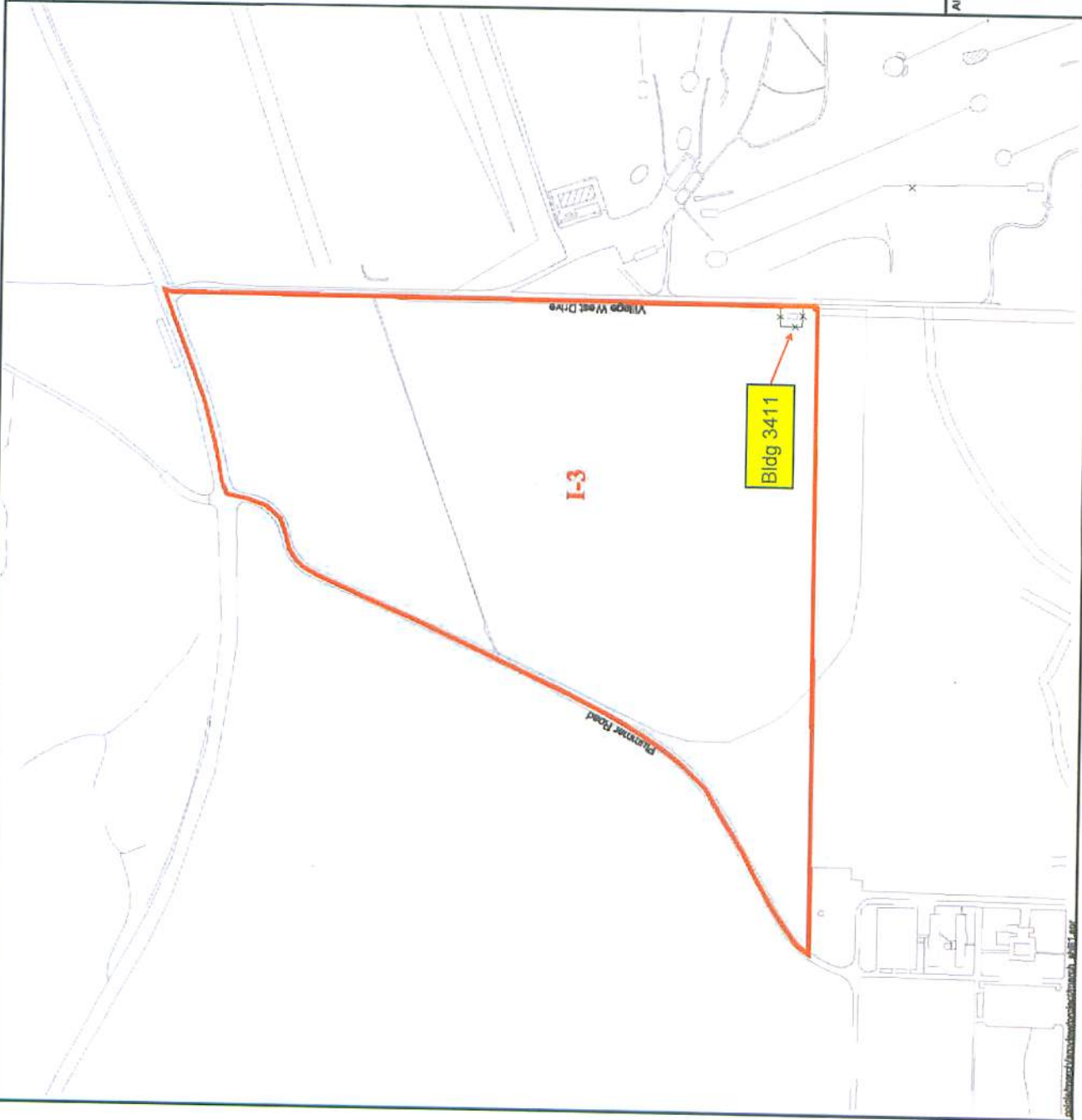


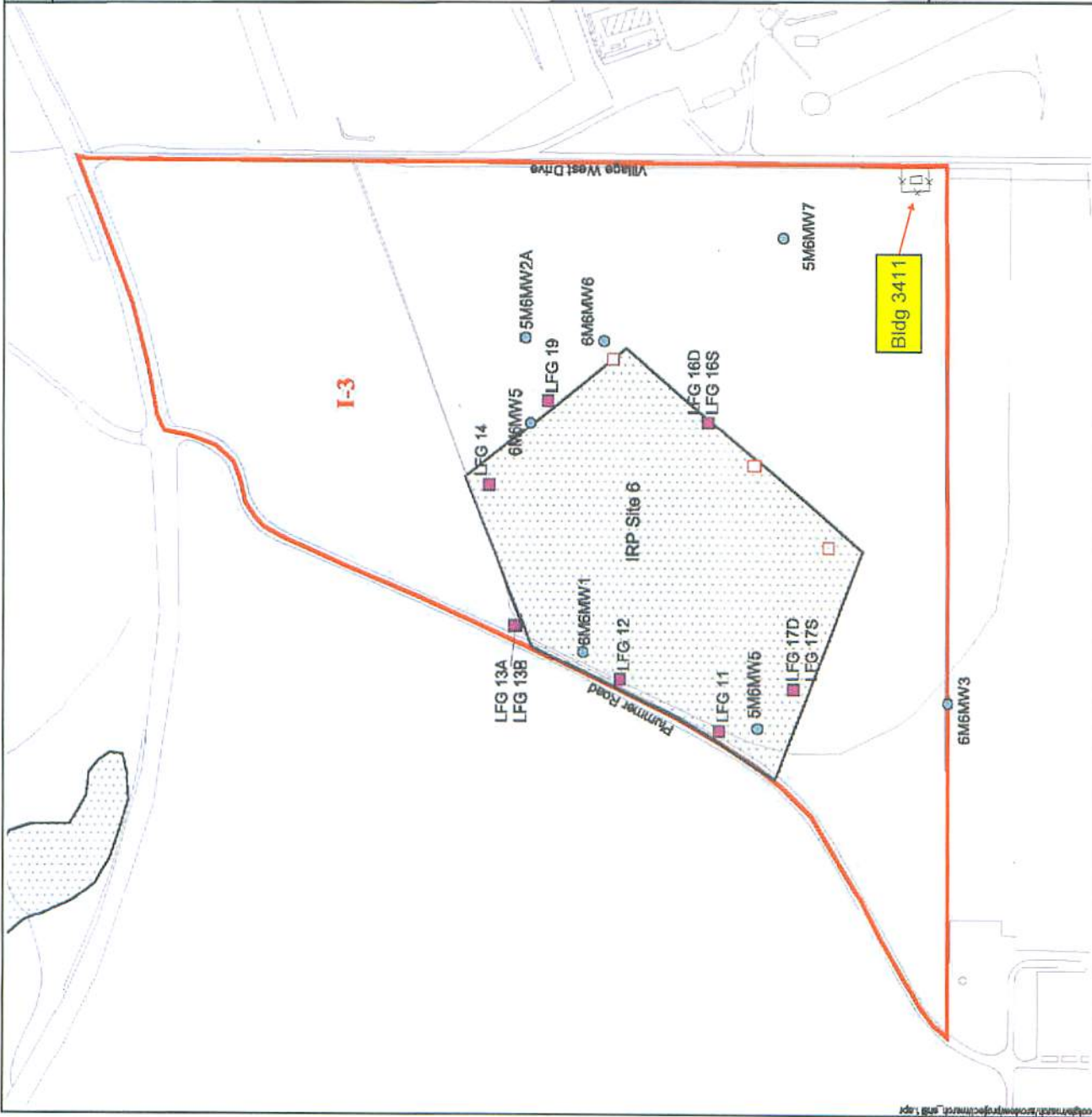
300 0 300 600 Feet
January 2005

AIR FORCE REAL PROPERTY AGENCY

Attachment 1a

FOST Parcel Map for Parcel I-3
March Air Force Base, California





LEGEND

- Structures/ Roads
- IRP Site
- Parcel I-3
- Groundwater Monitoring Wells
- Landfill Gas Probes
- Proposed Landfill Gas Probes
- Building 3411

225 0 225 450 Feet

AIR FORCE REAL PROPERTY AGENCY

Attachment 1b

IRP Site 6, Landfill Gas Probes, and Monitoring Wells

Parcel I-3

March Air Force Base, California

ENVIRONMENTAL FACTORS TABLE

(Note: Each item identified with an "X" in the "Yes" column is discussed in Section 5)

Deed Restriction Or Notification Required?			<i>Environmental Factors Considered</i>
No	Yes		
	Notification	Deed Restriction	<i>Environmental Restoration, Hazardous Substances, Petroleum</i>
		X	Hazardous Substances (Notification)
		X	Installation Restoration Program (IRP) and Area of Concern
X			Petroleum Products and Derivatives
	X		UST/AST/Hydrant Systems
X			Oil/Water Separators (OWSs)
X			Military Munitions (UXO), (DMM), (WMM), (MC)
X			Radioactive & Mixed Wastes
X			Sanitary Sewer Systems
			<i>Disclosure Factors/Resources</i>
	X		Asbestos
X			Drinking Water Quality
X			Indoor Air Quality (Radon)
X			Lead-Based Paint (Housing)
	X		Lead-Based Paint (Facilities other than Housing)
	X		LBP and LBP Containing Materials and Debris
X			PCBs
			<i>Other Factors</i>
X			Air Conformity/Air Permits/Outdoor Air Quality
X			Energy (Utilities)
X			Flood Plains
X			Historic Property (Archeological/Native American,
X			Septic Tanks
X			Solid Waste
			<i>Biological Resources</i>
		X	Sensitive Habitat
X			Threatened and Endangered Species
		X	Wetlands

NOTICE OF HAZARDOUS SUBSTANCES DISPOSED

Notice is hereby provided that the following hazardous substances are known to have been disposed of on the Property and the date such disposal took place. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

Site 6-Landfill 4- Former March AFB

Substance Disposed	Regulatory Synonym(s)	CAS Registry Number	Quantity Disposed kilogram/year	Dates Disposed
PAHs	N/A	N/A	unknown	1950s–1980s
PCBs	Poly-chlorinated biphenyls	1336-36-3	unknown	1950s–1980s
Hexavalent Chromium	N/A	7440-47-3	unknown	1950s–1980s
Antimony	N/A	7440-36-0	unknown	1950s–1980s
Cadmium	N/A	7440-43-9	unknown	1950s–1980s
Arsenic	N/A	7440-38-2	unknown	1950s–1980s
Lead	N/A	7439-92-1	unknown	1950s–1980s
Dioxins	N/A	N/A	unknown	1950s–1980s
Organochlorine Pesticides	N/A	N/A	unknown	1950s–1980s
Organophosphorus Pesticides	N/A	N/A	unknown	1950s–1980s
VOC	N/A	N/A	unknown	1950s–1980s
SVOC	N/A	N/A	unknown	1950s–1980s

N/A=not applicable; VOC=volatile organic compounds; SVOC=semi-volatile organic compounds

NOTICE OF HAZARDOUS SUBSTANCES STORED

Notice is hereby provided that the following hazardous substances are known to have been stored for one year or more on the Property and the date such storage took place. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

Building 3411 (Water Pump Station)-Former March AFB

Substance Stored	Regulatory Synonym(s)	CAS Registry Number	Quantity Stored kg/year	Dates Stored
Chlorine	N/A	7782-50-5	Unknown	unknown

N/A=not applicable

NOTICE OF HAZARDOUS SUBSTANCES RELEASED

Notice is hereby provided that the following hazardous substances are known to have been released on the Property and the dates such release took place. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

IRP Site 6-Landfill 4

Substance	Regulatory Synonym(s)	CAS Registry Number	Quantity kg/lbs	Date	Hazardous Waste ID Number	Response	Remarks
PAHs	N/A	N/A	Unknown	Unknown	N/A	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	See OU 2 ROD for more details.
PCBs	Poly-chlorinated biphenyls	1336-36-3	Unknown	Unknown	N/A	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	See OU 2 ROD for more details.
Hexavalent Chromium	N/A	7440-47-3	Unknown	Unknown	Unknown	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No	See OU 2 ROD for more details.

Substance	Regulatory Synonym(s)	CAS Registry Number	Quantity kg/lbs	Date	Hazardous Waste ID Number	Response	Remarks
						additional action approved in the OU 2 ROD.	
Antimony	N/A	7440-36-0	Unknown	Unknown	Unknown	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	See OU 2 ROD for more details.
Cadmium	N/A	7440-43-9	Unknown	Unknown	Unknown	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	See OU 2 ROD for more details.
Arsenic	N/A	7440-38-2	Unknown	Unknown	Unknown	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	See OU 2 ROD for more details.
Lead	N/A	7439-92-1	Unknown	Unknown	Unknown	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional	See OU 2 ROD for more details.

Substance	Regulatory Synonym(s)	CAS Registry Number	Quantity kg/lbs	Date	Hazardous Waste ID Number	Response	Remarks
						Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	
Dioxins	N/A	N/A	Unknown	Unknown	Unknown	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	See OU 2 ROD for more details.
Organochlorine Pesticides	N/A	N/A	Unknown	Unknown	Unknown	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	See OU 2 ROD for more details.
Organophosphorus Pesticides	N/A	N/A	Unknown	Unknown	Unknown	Approximately 63,000 cubic yards of contaminated soil was removed. Landfill cap was installed and monitoring has been ongoing. Institutional Controls (ICs) apply to site. No additional action approved in the OU 2 ROD.	See OU 2 ROD for more details.

N/A=not applicable; PAH=polynuclear aromatic hydrocarbon; PCBs=polychlorinated biphenyls; OU=Operable Unit;
ROD=Record of Decision



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

June 30, 2005

Mr. Philip Mook
March AFB Environmental Coordinator
3411 Olson Street, Room 105
McClellan AFB, California 95652

Dear Mr. Mook:

This letter transmits EPA's comments on the document entitled "Draft FOST Package, Parcel 1-3, at Former March AFB and ARB, California".

If you have any questions regarding these comments please call me at (415) 972-3145.

Sincerely,

John Lucey,
Remedial Project Manager
U.S. EPA

**EPA Review Comments for
Draft FOST Package, Parcel 1-3,
Former March AFB and ARB, California**

1. There is no discussion of the Groundwater quality. If there is no contamination, it should be stated.
2. There is no discussion of pesticides. If there is no contamination, it should be stated.
3. The FOST needs a deed restriction rather than notification. The deed restriction should prohibit reuse as residential until a LBP sampling and assessment and any necessary abatement is done.
4. The description of the deed provisions, appearing at page 4 and page 11, should include a right of access for the regulators. The OU-2 ROD provides for the following:

“Each deed will also contain a reservation of access to the property as required under CERCLA for the Air Force, USEPA, and the State of California, and their respective officials, agents, employees, contractors, and subcontractors for purposes consistent with the Air Force Installation Restoration Program (“IRP”) or the Federal Facility Agreement (“FFA”).



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

5798 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

June 20, 2005

Mr. Philip Mook
AFRPA/DD-March BRAC Environmental Coordinator
3411 Olson Street
McClellan, California 95652-1071

DRAFT SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS) AND
DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST), PARCEL I-3, FORMER
MARCH AIR FORCE BASE (MAFB), CALIFORNIA

Dear Mr. Mook:

The Department of Toxic Substances Control (DTSC) has reviewed the draft SEBS and draft FOST for Parcel I-3 sent via electronic mail on May 17, 2005. Parcel I-3 is approximately 100 acres consisting of one field and one structure associated with the Water Pump Station operated by the Western Municipal Water District (WMWD). The anticipated use of the property, as stated in the FOST, is for passive open space, community parks and recreational purposes. The SEBS documents the environmental conditions of the property, while the FOST is intended to establish that the property is suitable for transfer by deed.

DTSC's comments on the draft SEBS are included in Enclosure A, while the comments on the draft FOST are included in Enclosure B. If you have any questions, please do not hesitate to contact me at (714) 484-5458.

Sincerely,

Stephen Niou, PE
Base Closure Unit
Office of Military Facilities

cc: See next page.

♻️ Printed on Recycled Paper

Mr. Philip Mook
June 20, 2005
Page 2

cc: Mr. James Chang, SFD-8-1
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

Enclosure A

DRAFT SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS), PARCEL
I-3, FORMER MARCH AIR FORCE BASE, CALIFORNIA

General Comments:

1. Please ensure consistency between the SEBS and the Finding of Suitability to Transfer (FOST).
2. Please spell out acronyms the first time they are used in the document (i.e., OU).
3. Installation Restoration Program (IRP) Site 6 is referred to as IRP Site 6, LF006 and Landfill 4. Please refer to the site consistently throughout this document and the FOST.

Specific Comments:

1. Pages 1 and 2, Section 2.0, Survey Methodology, #2 – A Final 2003-2004 Annual Monitoring Report has been issued. Please update.
2. Pages 1 and 2, Section 2.0, Survey Methodology, #5 – Please change "Study" to "Statement". Also, please explain how this document is different than the document listed in #8 (Final Environmental Impact Statement, Volume I, dated February 1996). If they are one in the same, please delete one of the documents.
3. Pages 1 and 2, Section 2.0, Survey Methodology, #6 – The date listed (January 27, 2005) is not consistent with Attachment 3 which shows the dates as 4/19/05 and 2/18/05 and the FOST, Section 1.2 as February 18, 2005. Please correct the inconsistencies.
4. Page 2, Section 5.1, Visual Site Inspection (VSI) – Please see Specific Comment #3 above.
5. Page 3, Section 5.3, Installation Restoration Program (IRP) – Please change LF006 to LF004 as Landfill 4, not Landfill 6 is located at Site 6.
6. Page 3, Section 5.3, Installation Restoration Program (IRP) – The groundwater monitoring wells are mentioned in the second paragraph, but why aren't the landfill gas (LFG) probes discussed? The LFG probes are shown on Attachment 2, but are not discussed in the text. Please explain.
7. Page 3, Section 5.5, Underground and Aboveground Storage Tanks (USTs and ASTs) and Hydrant Systems – Please state the capacity of the UST.
8. Page 4, Section 5.7, Sanitary Sewer Systems (Wastewater) – Please state the status.

9. Page 4, Section 5.10, Petroleum Products and Derivatives – It states, "...no petroleum products or derivatives were stored or used on the Property..." This is inconsistent with Section 5.5 (UST/AST). Please correct the inconsistency.
10. Page 4, Section 5.11, Asbestos-Containing Material (ACM), Paragraph 1 – A VSI was conducted for Building 3411 on 4/19/05 (Attachment 3). Was the building inspected for ACM on that day? If so, please include the information in this paragraph.
11. Page 4, Section 5.13, LBP (Facilities other than Housing) – The paragraph states, "...the environmental conditions have not changed since the EBS Category Update." What were the conditions? Also, according to Attachment 3, the date of April 18, 2005 should be changed to April 19, 2005.
12. Page 5, Section 5.18, Polychlorinated Biphenyls (PCBs) - The information listed is for utilities not PCBs. Please correct and ensure consistency with the FOST.
13. Page 6, Section 5.27, Sensitive Habitats – The information presented is not consistent with the FOST. Please correct the inconsistency. Also, the section states "...These sensitive habitats would not be adversely affected by the proposed reuse activities if these areas were left undisturbed."... Please explain what mechanism will be in place to ensure these areas are left undisturbed.
14. Page 6, Section 5.28, Threatened and Endangered Species – Please state the status.
15. Page 6, Section 5.30, Floodplains – Please state the status.
16. Pages 6 and 7, Section 5.32, Adjacent Property – The paragraph states that "An evaluation of adjacent properties was conducted for the presence (and former presence) of IRP sites, EBS sites, SWMUs, leaking petroleum storage tanks, oil/water separators, washracks, septic tanks, and silver recovery units within ¼ mile of the Property and all underground storage tanks sites within 500 feet of the Property." The paragraph goes on to discuss IRP sites, USTs and one AST. Were these the only sites found during the evaluation? If so, please state in the paragraph.
17. Page 6, Section 5.32, Adjacent Property, Paragraph 2 – Please be consistent with the way the IRP sites are listed here and in Attachment 5.
18. Page 7, Attachments – The title for Attachment 6 (Hazardous Material Stored/Released) is not consistent with the title listed on Attachment 6 (Hazardous Substances Stored and Release [sic]). Please correct.
19. Attachment 2, IRP Site 6, Landfill Gas Probes, and Monitoring Wells, Parcel I-3 - Please include the underground/aboveground storage tanks on the figure. Please include "Buildings" in the legend and label Building 3411 on the figure.

20. Attachment 3, VSI Report for Facility Number: 3411 – Why isn't asbestos discussed in this report? Please explain. Also, the information listed for the AST ("inactive and empty") is not consistent with page 3 ("AST-3411 is a 500 gallon capacity diesel storage tank and is presently used at the water pump station.") Please correct the inconsistency.
21. Attachment 3, VSI Report for Facility Number: Open Space – Facility No.: 5901 is mistakenly listed on pages 14 and 15 of 19. Please correct. Also, why aren't the LFG probes listed on the form? Please explain.
22. Attachment 4, Sensitive Habitats and Wetlands – This figure is very difficult to read. Please provide a more legible figure.
23. Attachment 5, Adjacent Properties within 0.25-mile Radius, Parcel I-3 – The yellow color for the "buildings" is too light. Please use a darker color. Also, please include the underground and aboveground storage tanks on the figure.
24. Attachment 6, Hazardous Substances Stored and Release –
 - a. Please include a note below the table explaining the acronyms/abbreviations.
 - b. Please don't leave any blanks in the table.
 - c. Please state what this table is supposed to represent (i.e., Site 6, Landfill and Building 3411). It would be helpful to include a new column with this information.
 - d. Why not change the title to "Hazardous Substances Notification"? It would also be helpful to include a column that shows whether the substance was released (R), stored (S) or disposed (D).
 - e. Attachment 3 states that chlorine gas and fluoride were stored on wooden pallets outside of Building 3411. Why isn't this information included in the table?

Enclosure B

DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST), PARCEL I-3, FORMER
MARCH AIR FORCE BASE, CALIFORNIA

General Comments:

1. Please ensure consistency between the FOST and the Supplemental Environmental Baseline Survey (SEBS).

2. Installation Restoration Program (IRP) Site 6 is referred to as IRP Site 6, LF006 and Landfill 4. Please refer to the site consistently throughout this document and the FOST.
3. Please include, as an attachment, the November 1994 No Further Action (NFA) concurrence letter from the Riverside County Department of Environmental Health for underground storage tank (UST) Site 3411.
4. Adjacent properties are discussed in the SEBS, but should also be summarized and included in the FOST.
5. Please provide as an attachment, the Air Force's policy and/or guidance regarding lead-based paint (LBP), radon and asbestos.
6. According to the SEBS (Attachment 2) there are numerous monitoring wells and landfill gas probes on the FOST property. Please include a discussion in the FOST regarding the monitoring wells and probes. Please explain if they will be abandoned/decommissioned prior to transfer, or will remain in use.
7. Please include in the FOST, a copy of the figure found in the SEBS (Attachment 2).
8. If applicable, please include a petroleum products notification and table (similar to the hazardous substances notification and table). This would list petroleum products only, which are within the scope of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Petroleum Exclusion set forth in CERCLA Section 101(14).

Specific Comments:

1. Page 1, Table 2.0, Property Inventory Description, Column 2 – Isn't the former use actually the current use as well? If so, please state this information in the table. Also, please add a new column that discusses the year of construction.
2. Page 4, Section 5.2.2, IRP Institutional Controls, Paragraph 3 – Please use the language from the Operable Unit 2 Record Of Decision (pages 7-3, 7-7 and 10-1), which not only states that the United States will have access to the property, but the State of California, will also have access.
3. Page 5, Last Two Bullet Items – Does "landfill equipment or systems" include the landfill gas probes? Please explain.
4. Page 6, Table 5.7, Underground and Aboveground Storage Tanks – Please change "Removed 1994" to "Removed 1991" for consistency with the text and the SEBS. In the SEBS it states that UST-3411 contained gasoline and diesel, but in this table it says the contents are diesel. Please correct the inconsistency.

5. Pages 6 and 7, Section 5.8, Asbestos-Containing Material (ACM) – Why isn't the IRP Site 6 (Landfill 4) discussed here?
6. Page 6 and 7, Section 5.8.1, ACM in Structures and Buildings – Please refer to Enclosure A, Specific Comment #'s 3, 4, 9, and 19.
7. Page 8, Section 5.10, Indoor Air Quality (Radon) – Please explain why the Air Force has not tested for radon gas in facilities on the property.
8. Page 8, Section 5.12, Residuals of Lead-Based Paint and Lead-Based Material and Debris (collectively, "LBP"), Paragraph 1, Sentence 3 – Please explain in more detail the evaluation that was conducted which led to the Air Force concluding that "...remedial action under CERCLA is not necessary." Also, why isn't the IRP Site 6 (Landfill 4) discussed here?
9. Page 8, Section 5.12, Residuals of Lead-Based Paint and Lead-Based Material and Debris (collectively, "LBP") – Based on information provided in the SEBS and FOST, Parcel I-3 includes a facility that was constructed prior to 1978, the year when LBP products were discontinued. The age of this facility suggests the likelihood that LBP may be present on this facility. This in turn creates the possibility that, through the action of normal weathering and maintenance, there may be lead from LBP in the soil surrounding this facility. The Department of Toxic Substances Control (DTSC) maintains that lead released to the soil from LBP is a potential CERCLA release. The only LBP evaluation noted in the SEBS was a visual site inspection conducted on April 19, 2005, which indicated that the interior and exterior condition of the paint was good. Soil sampling in the vicinity of this pre-1978 facility is necessary to ensure that lead from LBP is not present at levels posing a threat to human health and the environment. Absent the evaluation of soil-lead hazards, the Air Force must place appropriate restrictions and notifications in the FOST and all associated sale and transfer documents to ensure public health and environmental protection. Please find below, the notification and restriction language DTSC is requesting:

Although Parcel I-3 is not slated for residential reuse, but is slated for passive open space, community parks and recreational purposes, please include the following notification: "Notifications of potential LBP at facilities within the parcel proposed for transfer are based on the age of construction (i.e., constructed before the Consumer Product Safety Commission's 1978 ban on LBP for residential use). The parcel proposed for transfer contains one facility (Building 3411) that was constructed in 1953 and may contain LBP. The age of the facility on the property suitable for transfer suggests the likelihood that lead-based paint may be present on the facility. This in turn creates the possibility that, through the action of normal weathering and maintenance, there may be lead from lead-based paint in the soil surrounding this facility."

"Demolition of non-residential facilities built prior to 1978 creates the possibility of lead being found in the soil as a result of such activities. With respect to any such non-residential facilities which the transferee intends to demolish and redevelop for residential use after transfer, the transferee may, under applicable law or regulation, be required by DTSC or other regulatory agencies to evaluate the soil adjacent to such non-residential facilities for soil-lead hazards, and to abate any such hazards that may be present, after demolition of such non-residential facilities and prior to occupancy of any newly constructed residential facilities."

"Although Parcel I-3 is not slated for residential rouse, but is slated for passive open space, community parks and recreational purposes, please include the following restriction: "Facilities constructed prior to 1978 may not be used for residential use or child-occupied facilities unless the transferee performs any necessary evaluation(s) and abatement in accordance with all federal, state, and local laws and other applicable requirements."

10. Page 9, Section 5.19, Sensitive Habitat – This is not consistent with the SEBS, Section 5.27. Please correct the inconsistency.
11. Page 10, Section 6.0, Regulator Coordination – Please reference Attachment 7.
12. Page 10, Section 7.0, Public Notice – According to page 11, Attachment 8 should be changed to Attachment 9.
13. Attachment 2, Environmental Factors Table
 - a. Petroleum Products and Derivatives – Both the No and Yes columns are checked. Please correct.
 - b. Storage Tanks (UST/AST) – "X-D" is not consistent with Section 5.7. Please correct the inconsistency.
 - c. Air Conformity/Air Permits – For consistency with Section 5.14, please change to "Air Conformity/Air Permits/Outdoor Air Quality".
 - d. Sensitive Habitat and Threatened and Endangered Species – Neither of these categories has the No or Yes boxed checked. Please correct.
14. Attachment 3, Notice of Hazardous Substances Disposed and Attachment 4, Notice of Hazardous Substances Released – Please refer to Enclosure A, Specific Comment #23 above.
15. Attachment 4, Notice of Hazardous Substances Released – The opening paragraph mistakenly lists "Parcel A-9". Please correct.
16. Attachment 6, Sensitive Habitats – Please refer to Enclosure A, Specific Comment #21 above.

**AFRPA RESPONSE TO
EPA COMMENTS DATED JUNE 30, 2005
DRAFT FOST PACKAGE, PARCEL, PARCEL I-3
MARCH AIR FORCE BASE**

Cmt #	EPA Comment	AFRPA Response
1	There is no discussion of the groundwater quality. If there is no contamination, it should be stated.	<p>Section 5.3 of the Supplemental Environmental Baseline Survey (SEBS) mentions that both the soil and water contained polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), herbicides, and dioxins. Additionally, Section 5.2.2 of the Finding of Suitability to Transfer (FOST) includes restrictions that do not allow any extraction of groundwater for use except for monitoring purposes only; however, for clarification, the following has been included under Section 5.2.1 "Groundwater is sampled on a semiannual basis in accordance with the Basewide Groundwater Monitoring program, as required to meet post-closure compliance with Code of Federal Regulations (CFR), Title 40, Part 258 (40 CFR 250) and the California Code of Regulations (CCR) Title 27, Subchapter 3, Article 1. The results of the November 30, 2005 sampling event indicated non-detect for volatile organic compounds in all of the four downgradient monitoring wells except for 6M6MW6, which reported an estimated concentration of 0.41 micrograms per liter (µg/L) for tetrachloroethene (PCE), and a concentration of 20µg/L for trichloroethene. However, historical analytical results from 6M6MW6 have not shown the presence of these contaminants of concern and will be verified in future sampling events. The potential for future use of groundwater as a potable source is extremely unlikely."</p>
2	There is no discussion of pesticides. If there is no contamination, it should be stated.	<p>Pesticide contamination is noted as part of the installation restoration program (IRP) site LF006 in Section 5.3 of the SEBS; however, it was not specifically addressed; this will be corrected in the next submittal of the SEBS.</p>
3	The FOST needs a deed restriction rather than notification. The deed restriction should prohibit reuse as residential until a LBP sampling and assessment and any necessary abatement is done.	<p>The LBP language in Section 5.12 is standard AFRPA language and was not changed. As stated in the FOST, the deed will include a grantee covenant that the grantee and successors acknowledge and accept responsibility for managing LBP in accordance with all applicable laws and regulations.</p>
4	The description of the deed provisions, appearing at page 4 and	<p>In section 5.2.2, the FOST's right of access language has been</p>

AFRPA RESPONSE TO
EPA COMMENTS DATED JUNE 30, 2005
DRAFT FOST PACKAGE, PARCEL, PARCEL I-3
MARCH AIR FORCE BASE

	<p>page 11, should include a right of access for the regulators. The OU-2 ROD provides for the following:</p> <p>“Each deed will also contain a reservation of access to the property as required under CERCLA for the Air Force, USEPA, and the State of California, and their respective officials, agents, employees, contractors, and subcontractors for purposes consistent with the Air Force Installation Restoration Program (“IRP”) or the Federal Facility Agreement (“FFA”).</p>
changed and is now consistent with the OU-2 ROD.	

**AFRPA RESPONSE TO DTSC COMMENTS
MARCH AFB PARCEL 1-3 DRAFT FOST/SEBS
JUNE 20, 2005**

Item	DTSC Comments	AFRPA Response
SEBS General Comments (Enclosure A)		
1.	Please ensure consistency between the SEBS and the Finding of Suitability to Transfer (FOST).	Consistency has been checked between the Supplemental Environmental Baseline Survey (SEBS) and the FOST, changes were made as appropriate.
2.	Please spell out acronyms the first time they are used in the document (i.e., AFB, RCRA, IC, EPA, CRWQB, and USFWS).	Acronyms will be spelled out for the first time they are used in the document in the next submittal.
3.	Installation Restoration Program (IRP) Site 6 is referred to as Site 6, LF006 and Landfill 4. Please refer to the site consistently throughout this document and the FOST.	Consistency has been checked between the SEBS and the FOST, changes were made as appropriate.
SEBS Specific Comments (Enclosure A)		
1.	Pages 1 and 2, Section 2.0, Survey Methodology, #2- A Final 2003-2004 Annual Monitoring Report has been issued. Please update.	Updates completed.
2.	Pages 1 and 2, Section 2.0, Survey Methodology, #5-Please change "Study" to "Statement." Also, please explain how this document is different than the document listed in #8 (Final Environmental Impact statement, Volume I, dated February 1996). If they are one in the same, please delete one of the documents.	Section 2.0, Survey Methodology, #5 has been deleted.
3.	Pages 1 and 2, Section 2.0, Survey Methodology, #6-The date listed (January 27, 2005) is not consistent with Attachment 3 which shows the dates as 4/19/05 and 2/18/05 and the FOST, Section 1.2 as February 18, 2005. Please correct the inconsistencies.	An initial VSI was accomplished on January 27, 2005, with a follow-up Visual Site Inspection on April 19, 2005 and March 7, 2006. "April 19, 2005 and March 7, 2006" will be included in Section 2.0, Survey Methodology #6. Additionally, "2/18/2005" was a misprint on the VSI.
4.	Page 2, Section 5.1, Visual Site Inspection (VSI)-Please see Specific Comment #3 above.	An initial VSI was accomplished on January 27, 2005, with a follow-up VSI on April 19, 2005 and March 7 2006. Additionally, "2/18/2005" was a misprint on the VSI.
5.	Page 3, Section 5.3, Installation Restoration Program (IRP)-Please change LF006 to LF004 as Landfill 4, not Landfill 6 is located at Site 6.	LF006 is the identified nomenclature for IRP Site 6, Landfill 4, and is tracked as such under the Air Force Management Information System (MIS).
6.	Pages 3, Section 5.3, Installation Restoration Program (IRP)-The groundwater monitoring wells are mentioned in the second paragraph, but why aren't the landfill gas (LFG) probes discussed? The LFG probes are shown on Attachment 2, but are not discussed in the text. Please explain.	Information on the LFG probes is included within Section 5.3.

Item	DTSC Comments	AFRPA Response
7.	Page 3, Section 5.5, Underground and Aboveground Storage Tanks (USTs and ASTs) and Hydrant Systems-Please state the capacity of the UST.	Capacity for UST-3411 was unknown according to the EBS. Additionally, the UST was removed prior to base closure.
8.	Page 4, Section 5.7, Sanitary Sewer Systems (Wastewater)-Please state the status.	According to the EBS, no sanitary sewer system was located within the Property boundaries. This has been verified throughout the VSI.
9.	Page 4, Section 5.10, Petroleum Products and Derivatives-It states "...no petroleum products or derivatives were stored or used on the Property..." This is inconsistent with Section 5.5 (UST/AST). Please correct the inconsistency.	Section 5.10 has been rewritten to read as follows: "Petroleum products were stored or used on the Property within Facility 3411. For additional information, refer to section 5.5. Additionally, the engineered waste cells...."
10.	Page 4, Section 5.11, Asbestos-Containing Material (ACM). Paragraph 1-A VSI was conducted for Building 3411 on 4/19/2005 (Attachment 3). Was the building inspected for ACM on that day? If so, please include the information in this paragraph.	The following will be included in the next submittal: "No damaged or deteriorated friable ACM was observed at the time of the previously conducted VSIs or during the April 19, 2005 and March 7, 2006, VSI."
11.	Page 4, Section 5.13, LBP (Facilities other than Housing)-The paragraph states "...environmental condition have not changed since the EBS Category Update." What were the conditions? Also, according to Attachment 3, the date of April 18, 2005 should be changed to April 19, 2005.	The EBS Category Update identified the environmental condition for the potential LBP in good condition. No chipping, peeling, or flaking of potential LBP was identified at that time or during the VSI. The date has been corrected to reflect March 7, 2006, the most recent VSI.
12.	Page 5, Section 5.18, Polychlorinated Biphenyls (PCBs)-The information listed is for utilities not PCBs. Please correct and ensure consistency with the FOST.	Section 5.18 has been rewritten as follows: "No PCB equipment are present on the Property; however, the engineered waste cells constructed at Site 6 contained PCBs among other contaminated media. The soil cap placed over the engineered waste cells prevents potential receptor exposure to the waste and the site was treated as a closure in place rather than a clean closure."
13.	Page 5, Section 5.27, Sensitive Habitats-The information presented is not consistent with the FOST. Please correct the inconsistency. Also, the section states..."These sensitive habitats would not be adversely affected by the proposed reuse activities if these areas were left undisturbed." ...Please explain what mechanism will be in place to ensure these areas are left undisturbed.	<p>a. The sentence "These sensitive habitats would not be adversely affected by the proposed reuse activities if these areas were left undisturbed" has been removed in the next submittal.</p> <p>b. The mechanism that will be put in place to ensure these areas are left undisturbed will be contained within the signed Deed as identified within the FOST.</p>

Item	DTSC Comments	AFRPA Response
14.	Page 6, Section 5.28, Threatened and Endangered Species-Please state the status.	This section has been written as follows: "The endangered Riverside fairy shrimp, the proposed endangered conservancy fairy shrimp, and the vernal pool fairy shrimp were not observed during the October 1996 <i>Final Threaten and Endangered Species Survey Report</i> ; however, potential habitat for these species do exist within the Property boundary."
15.	Page 6, Section 5.30, Floodplains-Please state the status.	The Property boundaries are outside of the 100-year floodplain. The following has been included in the next submittal, "This Property is not located within the 100-year floodplain."
16.	Page 6 and 7, Section 5.32, Adjacent Property-The paragraph states that "An evaluation of adjacent properties was conducted for the present (and former presence) of IRP sites, EBS sites, SWMUs, leaking petroleum storage tanks, oil/water separators, washracks, septic tanks, and silver recovery unities within ¼ miles of the Property and all underground storage tanks within 500 feet of the Property." The paragraph goes on to discuss IRP sites, USTs, and one AST. Were these the only sties found during the evaluation? If so, please state in the paragraph.	The following sentence has been included within the first paragraph of Section 5.32: "Listed below describes the sites that were identified within ¼ mile of the Property."
17.	Page 6, Section 5.32, Adjacent Property, Paragraph 2-Please be consistent with the way the IRP sites are listed here and in Attachment 5.	This has been corrected in the next submittal.
18.	Page 7, Attachments-The title for Attachment 6 (Hazardous Material Stored/Released) is not consistent with the title listed on Attachment 6 (Hazardous Substances Stored and Release [sic]). Please correct.	"Material" has been replaced with "Substance."
19.	Attachment 2, IRP Site 6, Landfill Gas Probes, and Monitoring Wells, Parcel 1-3-Please include the underground/aboveground storage tanks on the figure. Please include "Buildings" in the legend and table Building 3411 on the figure.	The underground/aboveground storage tanks are located near Building 3411. Building 3411 is labeled. Due to the map scale for the Property, it is difficult to include the underground/aboveground storage tanks located at Building 3411.

Item	DTSC Comments	AFRPA Response
20.	Attachment 3, VSI Report of Facility Number 3411-Why isn't asbestos discussed in this report? Please explain. Also, the information listed for the AST ("inactive and empty") is not consistent with page 3 ("AST-3411 is a 500 gallon capacity diesel storage tank and is presently used by the water pump station.") Please correct the inconsistency.	<ul style="list-style-type: none"> • Even though asbestos is not specifically addressed within the VSI report, it is addressed as part of the general condition of the facility. • During the VSI, it was noticed that the tank was not being used at that time, but may be used at a later time by the Western Municipal Water District.
21.	Attachment 3, VSI Report for Facility Number: Open Space-Facility No.: 5901 is mistakenly listed on pages 14 and 15 of 19. Please correct. Also, why aren't the LFG probes listed on the form? Please explain.	Facility No. 5901 and the date inspected of 2/18/2005 have been removed from the VSI reports. The condition of the LFG probes is normally covered in the Semiannual IRP 6 Monitoring Reports. It is not necessary to include the condition of these probes unless they are in poor shape.
22.	Attachment 4, Sensitive Habitats and Wetlands-This figure is very difficult to read. Please provide a more legible figure.	This figure was from the Final Environmental Impact Statement (FEIS) report that was written in 1996
23.	Attachment 5, Adjacent Properties within 0.25-mile Radius, Parcel I-3-The yellow color for the "building" is too light. Please use a darker color. Also, please include the underground and aboveground storage tanks on the figure.	Comment was noted; however, it is not necessary for Property transfer documentation or for copying purposes. The adjacent UST/ASTs do not affect the Property to be transferred and, therefore, are not required to be shown. Additionally, all USTs have been removed and the one AST is currently active as stated in Section 5.32 of the SEBS.

Item	DTSC Comments	AFRPA Response
24.	<p>Attachment 6, Hazardous Substances Stored and Release-</p> <ul style="list-style-type: none"> a. Please include a note below the table explaining the acronyms/abbreviations. b. Please don't leave any blanks in the table. c. Please state what this table is supposed to represent (i.e., Site 6, Landfill and Building 3411). It would be helpful to include a new column with this information. d. Why not change the title to "Hazardous Substances Notification"? It would also be helpful to include a column that shows whether the substance was released (R), stored (S), or disposed (D). e. Attachment 3 states that chlorine gas and fluoride were stored on wooden pallets outside of Building 3411. Why isn't this information included in the table? 	<ul style="list-style-type: none"> a. A note will be included in the table to explain the acronyms/abbreviations. b. N/A will be inserted into the blanks within the table. c. This table represents hazardous substances stored and released within the property boundary. d. Additional information is provided in the next submittal. e. It was originally thought, that the quantities of chlorine gas were below the reportable quantities under 40 CFR 373; however, after reviewing the historical documents and based on the fact that quantities were unknown, chlorine gas will be included in the next submittal. However, the quantities of fluoride do not meet hazardous substance storage notice requirements and has not been included within the table.
FOST General Comments (Enclosure B)		
1.	Please ensure consistency between the FOST and the Supplemental Environmental Baseline Survey (SEBS).	Consistency has been checked between the FOST and SEBS.
2.	Installation Restoration Program (IRP) Site 6 is referred to as IRP Site 6, LF006 and Landfill 4. Please refer to the site consistently throughout this document and the FOST.	Consistency has been checked between the SEBS and the FOST, changes were made as appropriate.
3.	Please include, as an attachment, the November 1994 No Further Action (NFA) concurrence letter from the Riverside County department of the Environmental Health for underground storage tank (UST) Site 3411.	The NFA concurrence from the Riverside County Department has been previously submitted as part of the <i>EBS Category Update</i> , dated 1999. Additionally, the Closure Report for UST-3411 has been included in Attachment 7 of the SEBS.
4.	Adjacent properties are discussed in the SEBS, but should also be summarized and included in the FOST.	The FOST is considered a tool to develop the proper Deed language. As long as the adjacent property is not affecting the Property to be transferred, there is no reason to include this information in the FOST. The SEBS is used as a tool to confirm that adjacent property information is not necessary for the Deed.
5.	Please provide as an attachment, the Air Force's policy and/or guidance regarding lead-based paint (LBP), radon and asbestos.	Policy and guidance documents will not be attached to the FOST. They are made available upon request.

Item	DTSC Comments	AFRPA Response
6.	According to the SEBS (Attachment 2) there are numerous monitoring wells and landfill gas probes on the FOST property. Please include a discussion in the FOST regarding the monitoring wells and probes. Please explain if they will be abandoned/decommissioned prior to transfer, or will remain in use.	Normally, discussion on MWs and probes are included in the SEBS, not within the FOST, which is considered a tool to develop the proper Deed language. Per section 5.2.2, covenants will be included in the deed restricting activities that could damage monitoring systems. Current wells will remain after transfer, and MW and probe discussions (i.e., MW abandonment and decommissioning) are discussed as part of the Quarterly Operations Monitoring and Maintenance Report for Site 6.
7.	Please include in the FOST, a copy of the figure found in the SEBS (Attachment 2).	A copy of the map located in the SEBS, Attachment 2, will be included in the next submittal.
8.	If applicable, please include a petroleum product notification and table (similar to the hazardous substances notification and table). This would list petroleum product only, which are within the scope of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Petroleum Exclusion set forth in CERCLA Section 101 (14).	Since petroleum products are not hazardous substances under CERCLA, a notification table is not provided. The deed notifications associated with the USTs/ASTs and the Landfill are appropriate and adequate.
Specific Comments		
1.	Page 1, Table 2.0, Property Inventory Description, Column 2-Isn't the former use actually the current use as well? If so, please state this information in the table. Also, please add a new column that discusses the year of construction.	The column 2 title will read "Former Air Force Use" in the next submittal. Construction year added.
2.	Page 4, Section 5.2.2, IRP Institutional Controls, Paragraph 3-Please use the language from the Operable Unit 2 Record of Decision (pages 7-3, 7-7, and 10-1), which not only states that the United States will have access to the property, but the State of California, will also have access.	Language was added to Section 5.2.2 for continued access by regulatory agencies.
3.	Page 5, Last Two Bullet Items-Does "landfill equipment or systems" includes the landfill gas probes? Please explain.	Landfill equipment or systems would include the landfill gas probes and any other additional component that is required to meet the Air Force obligation under CERCLA and the Final OU 2 ROD.

Item	DTSC Comments	AFRPA Response
4.	Page 6, Table 5.7. Underground and Aboveground Storage Tanks-Please change "Removed 1994" to "Removed 1991" for consistency with the text and the SEBS. In the SEBS it states that UST-3411 contained gasoline and diesel, but in this table it says the contents are diesel. Please correct the inconsistency.	Correct removal year is 1991 and historically, UST-3411 contained gasoline or diesel. This corrected information is included.
5.	Pages 6 and 7, Section 5.8, Asbestos-Containing Material (ACM)-Why isn't the IRP Site 6 (Landfill 4) discussed here?	Even though IRP Site 6 is not specifically talked about in this section, as part of the Property, it still falls under section 5.8.3. ACM in Demolition Debris.
6.	Page 6 and 7. Section 5.8.1. ACM in Structures and Buildings-Please refer to Enclosure A. Specific Comment #'s 3.4.9. and 19.	The specific comments (3. 4, 9. and 19) are related to the VSIs, not specifically related to Section 5.8.1. Refer to the responses associated with these comments for additional information.
7.	Page 8, Section 5.10, Indoor Air Quality (Radon)-Please explain why the Air Force has not tested for radon gas in facilities on the property.	As part of the Air Force program, Radon was normally tested in housing areas. Parcel I-3 does not have residential homes; in addition, the future use of this land prohibits residential reuse.
8.	Pages 7 and 8. Section 5.12. Residuals of Lead-Base Paint and Lead-based Material and Debris (collectively, "LBP"). Paragraph 1. Sentence 3-Please explain in more detail the evaluation that was conducted which led to the Air force concluding that "...remedial action under CERCLA is not necessary." Also, why isn't the IRP Site 6 (Landfill 4) discussed here?	Other than at Site 6, none of the records (EBSs, PA/S, Site inspections, etc..) indicate a release of LBP associated with activities at parcel I-3. Furthermore, the Air Force does not consider flaking paint from buildings as a CERCLA release. Additionally, even though IRP Site 6 is not specifically discussed within this section, this section includes all of the Property for transfer.
9.	Pages 7 and 8. Section 5.12. residuals of Lead-Based Paint and Lead-Based Material and Debris (collectively, "LBP")-Base on information provided in the SEBS and FOST, Parcel I-3 includes a facility that was constructed prior to 1978, the year when LBP products were discontinued. The age of these facilities suggest the likelihood that LBP may be present on these facilities. This in turn creates the possibility that, through the action of normal weathering and maintenance, there may be lead from LBP in the soil surrounding these facilities. The Department of Toxic Substances Control (DTSC) maintains that lead released to the soil from LBP is a potential CERCLA release. The only LBP evaluations notified in the SEBS were visual site inspections conducted on April 19, 2005, which indicated that the interior and exterior painted surfaces of some of the facilities were chipped, cracked, peeling or flaking. Soil sampling in the vicinity of pre-1978 facilities are necessary to ensure that lead from LBP is not present at levels posing a threat to human health and the environment. Absent the evaluation of soil-lead hazards, the Air Force must lace appropriate restrictions and notification in the FOST and	The Air Force does not believe that there has been a CERCLA release of lead-base paint. The text for the FOST has not been changed as a result of this comment. The FOST, and in turn the Deed, already contains the notifications that DTSC is request. That is, notifications of the facilities on the Property that were constructed prior to 1978 are identified, that LBP may be on the Property, and that the grantee and successors acknowledge and accept responsibility for managing LBP in accordance with all applicable laws and regulations.

Item	DTSC Comments	AFRPA Response
	<p>all associated sale and transfer documents to ensure public health and environmental protection. Please find below, the notification and restriction language DTSC is requesting:</p> <p>Although Parcel I-3 is not slated for residential reuse, please include the following notification: "Notifications of potential LBP at facilities within the parcel proposed for transfer are based on the age of construction (i.e., constructed before the Consumer Product Safety Commission's 1978 ban on LBP for residential use). The parcel proposed for transfer contains one facility (Building 3411) that was constructed in 1953 and may contain LBP. The age of the facility on the property suitable for transfer suggests the likelihood that lead-based paint may be present on some of these facilities. This in turn creates the possibility that, through the action of normal weathering and maintenance there may be leads from lead-based paint in the soil surrounding these facilities. Attachment 2 (SEBS, 2005) provides a list of all facilities within the parcels proposed for transfer and their corresponding dates of construction."</p> <p>"Demolition of non-residential facilities built prior to 1978 creates the possibility of lead being found in the soil as a result of such activities. With respect to any such non-residential facilities which the transferee intends to demolish and redevelop for residential use after transfer, the transferee may, under applicable law or regulation, be required by DTSC or other regulatory agencies to evaluate the soil adjacent to such non-residential facilities for soil-lead hazards, and to abate any such hazards that may be present, after demolition of such no-residential facilities and prior to occupancy of any newly constructed residential facilities."</p> <p>Although Parcel I-3 is not slated for residential reuse, but is slated for passive open space, please include the following restriction: "Facilities constructed prior to 1978 may not be used for residential use or child-occupied facilities unless the transferee performs any necessary evaluation (s) and abatement in accordance with all federal, state, and local laws and other applicable requirements."</p>	<p>In addition, residential use is already restricted through other covenants as discussed in Section 5.2.2.</p>
10.	Page 9, Section 5.19, Sensitive Habitat-This is not consistent with the SEBS, Section 5.27. Please correct the inconsistency.	Information related to the sensitive habitats is now included in the FOST.
11.	Page 10, Section 6.0, Regulator coordination-Please reference Attachment 7.	Attachment 5 is referenced in the Draft-Final FOST since comments have been received by AFRPA.
12.	Page 10, Section 7.0, Public Notice-According to page 11, Attachment 8 should be changed to Attachment 9.	Attachment 8 will stay as is. Attachment 9 has been designated for Sensitive Habit Area and Wetlands map.

Item	DTSC Comments	AFRPA Response
13.	<p>Attachment 2, Environmental Factors Table</p> <ul style="list-style-type: none"> a. Petroleum Products and Derivates-Both the No and Yes columns are checked. Please correct. b. Storage Tanks (UST/AST)-"X-D" is not consistent with Section 5.7. Please correct the inconsistency. c. Air Conformity/Air Permits-For consistency with Section 5.14, please change to "Air Conformity/Air Permits/Outdoor Air Quality". d. Sensitive Habitat and Threatened and Endangered Species-Neither of these categories has the No or Yes boxed checked. Please correct. 	<ul style="list-style-type: none"> a. The marked column for "Yes" has been removed. b. This has been changed to a "notification". c. "Outdoor Air Quality" will be included in the next submittal. d. Sensitive Habitat is now marked as requiring a deed restriction. No Threatened and Endangered Species were observed and is not marked as requiring a notification or restrictions. Wetlands are included as requiring a restriction.
14.	<p>Attachment 3. Notice of Hazardous Substances disposed and Attachment 4. Notice of Hazardous substances Released-Please refer to Enclosure A, Specific Comment #23 above.</p>	<p>Enclosure A, Specific Comment #23 refers to the "Adjacent Properties within 0.25-mile Radius"; however. Enclosure A, Specific Comment #24 relates to Attachment 3. Notice of Hazardous Substances. Please refer to the response for Enclosure A, Specific Comment #24.</p>
15.	<p>Attachment 4, Notice of Hazardous Substances Released-The opening paragraph mistakenly lists "Parcel A-9". Please correct.</p>	<p>New opening paragraph used. Reference to Parcel A-9 removed.</p>
16.	<p>Attachment 6, Sensitive Habitats-Please refer to Enclosure A, Specific Comment #21 above.</p>	<p>Enclosure A, Specific Comment #21 refers to VSIs; however. Enclosure A, Specific Comment #22, relates to Sensitive Habitats. The enclosed map is from the FEIS.</p>

FOST Concurrence Related Correspondence

Solander Rick V Civ AFRPA COO/McClellan

From: Lucey,John@epamail.epa.gov
Sent: Thursday, March 23, 2006 10:39 AM
To: Solander Rick V Civ AFRPA COO/McClellan; S.Niou@dtsc.ca.gov
Cc: Hamill,John@epamail.epa.gov; Carr,Robert@epamail.epa.gov
Subject: Re: Dfat Final FOST and SEBS, March Parcel I-3

Hi Rick,

EPA reviewed the Final FOST for March Parcel I-3. All our comments have been addressed. We only have one additional comment. Please add clarifying text in bold.

In Section 5.1 of the POST, please expand the text to clarify that since a release occurred, consistent with CERCLA requirement for notification of hazardous substance releases, a Notice of Hazardous Substance Release including a description of response action taken, to the extent such information is available, is provided in Attachment 4. Additionally, a hazardous substance notice will be given in the Deed of the type and quantity of hazardous substances, the time at which release took place and the response action taken.

Let me know if you have any questions.

John Lucey
415 972 3145

Solander Rick V



Alan C. Lloyd, Ph.D.
Agency Secretary
CalEPA



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

March 27, 2006

Mr. Richard Solander
AFRPA/DD-March BRAC Environmental Coordinator
3411 Olson Street
McClellan, California 95652-1071

DRAFT FINAL SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS)
AND DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER (FOST), PARCEL I-3,
FORMER MARCH AIR FORCE BASE (MAFB), CALIFORNIA

Dear Mr. Solander:

The Department of Toxic Substances Control (DTSC) has reviewed the draft final SEBS and draft final FOST for Parcel I-3 sent via electronic mail on May 17, 2005. The area of Parcel I-3 is approximately 100 acres consisting of an open field and a structure associated with a water pump station. The anticipated use of the property, as stated in the FOST, is "for community parks and recreational purposes." The SEBS documents the environmental conditions of the property, while the FOST is intended to establish that the property is suitable for transfer by deed.

We recommend that at Section 5.2.2, page 6, first bullet, the Air Force (AF) list the agencies that may need to access the site: e.g., AF, DTSC, RWQCB, and US EPA.

DTSC considers any lead in soil from lead-based paint (LBP) to be a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) release. Facility 3411, the structure associated with the water pump station, was built prior to 1978 and may contain LBP; the AF has not screened for the presence of this substance and provided no data relative to the level of lead on the structure and/or the surrounding environment. DTSC does not have sufficient information to agree that the AF has adequately determined that all remedial action necessary to protect human health and the environment from the presence of LBP has been taken at Parcel I-3 prior to property transfer.

RECEIVED

MAR 30 2006

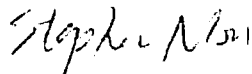
♻️ Printed on Recycled Paper

Mr. Richard Solander
March 27, 2006
Page 2 of 2

On the other hand, the transferee will be notified through the FOST and SEBS of the presence of LBP and/or LBP hazards at Facility 3411. There is a deed notification included in the FOST that "the transferee would be responsible for managing all LBP and potential LBP in compliance with all applicable laws and regulations and promptly notifying the AF of any discovery of LBP in soils that appears to be the result of AF activities and is at concentrations requiring remediation." In addition, the Draft Final FOST indicates that Site 6 will be restricted from being used for residential purposes.

All of DTSC's other comments on the draft SEBS and draft FOST have been adequately addressed and we have no major comments to be forwarded to the AF. If you have any questions, please do not hesitate to contact me at (714) 484-5458.

Sincerely,



Stephen Niou, PE
Base Closure Unit
Office of Military Facilities

cc: Mr. John Lucey, SFD-8-1
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

ADVERTISEMENT

**Former March Air Force Base
Public Notice of Comment Period
May 17 to June 15, 2005
FINDING OF SUITABILITY TO
TRANSFER (FOST)**

The Air Force Real Property Agency intends to sign FOST documents for Parcels A-9 and I-3, located at former March Air Force Base. Both parcels will be transferred to the March Joint Powers Authority. It is anticipated that Parcel A-9, a 32-acre parcel, will continue to be used as a wastewater treatment plant operated by the Western Municipal Water District. Parcel I-3 consists of 100 acres of undeveloped land. The FOST documents are based on an extensive review of the environmental condition of the property in consultation with federal and state environmental regulatory agencies. The property is being conveyed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 120(h)(3). Hazardous substances were stored or known to have been released or disposed of on the parcels, and all required cleanup actions have been completed. The property became available as a result of Public Law 101-510, (the Base Realignment and Closure Act of 1990) and the subsequent realignment of March.

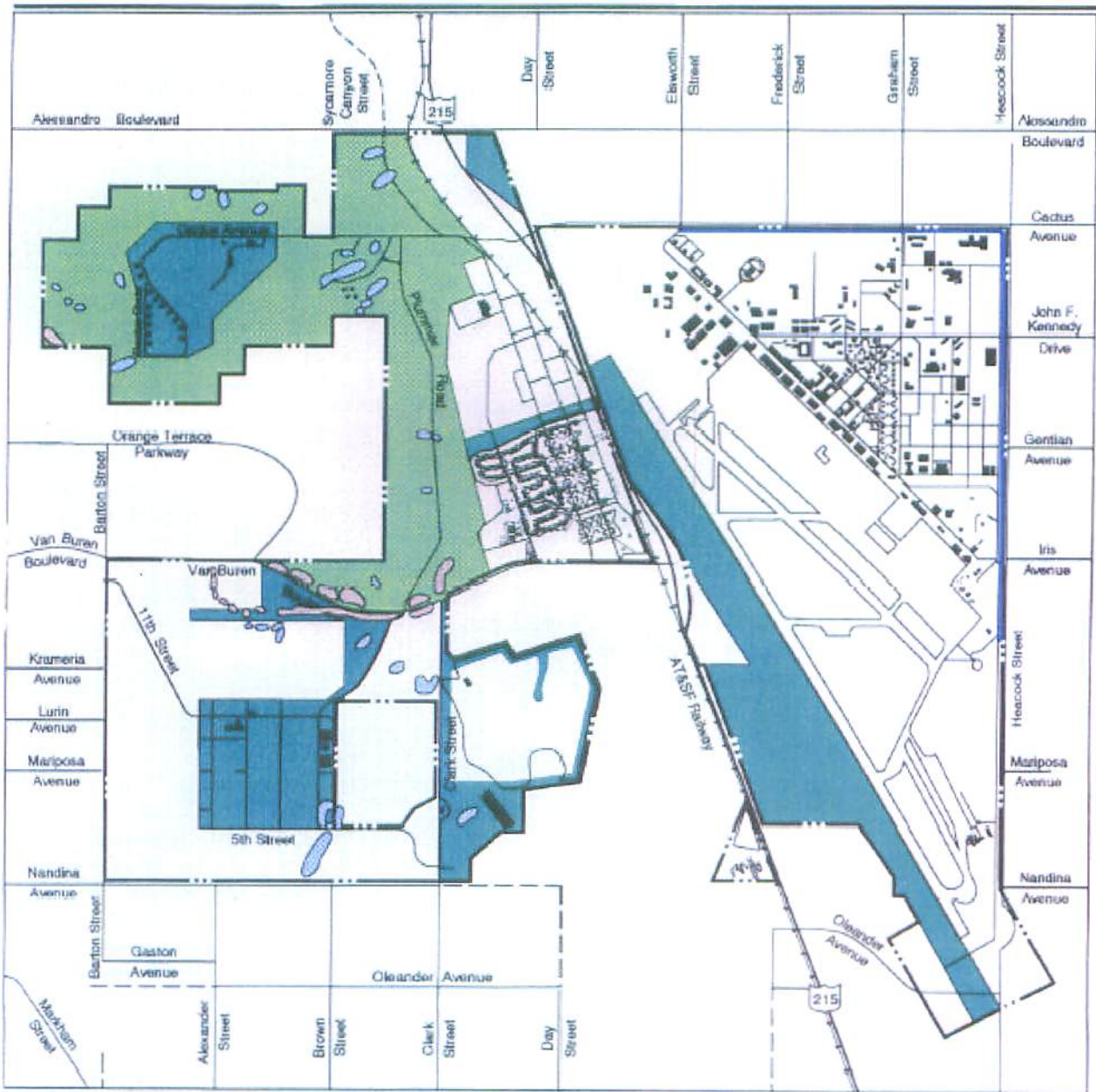
The public is invited to review and submit comments on this proposed transaction during the comment period, May 17 -- June 15, 2005. The FOST and supporting documents can be viewed at the address below or on the web at www.afrpa.hq.af.mil/mcclellan.

**Moreno Valley Public Library
25480 Alessandro Blvd.
Moreno Valley, CA 92553**








The U.S. Air Force will consider written comments received by June 15, 2005.

Please submit comments or questions to:

**Mr. Philip H. Mook, Jr. P.E.
Air Force Real Property Agency
3411 Olson Street, McClellan, CA 95652-1003
or e-mail: philip.mook@afarpa.pentagon.af.mil
Voice: (800) 655-7200, Ext 209 - Fax: (916) 643-5880**



EXPLANATION

- | | | | |
|---|-------------------------|---|-----------------------------------|
|  | SKR Management Area |  | Willow Riparian Habitat |
|  | SKR Open Space |  | Potential Jurisdictional Wetlands |
|  | Jurisdictional Wetlands | | |
|  | Unpaved Road | | |
|  | 1995 Base Boundary | | |



Sensitive Habitats

Figure 3.4-7